

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

MICHAEL F. ERALI, II,	)	
Plaintiff	)	
	)	
v.	)	C.A. NO. 04-30241-MAP
	)	
TOWN OF ORANGE	)	
Defendant	)	

SPECIAL VERDICT FORM

1. Has the plaintiff proved by a preponderance of the evidence that the defendant engaged in gender-based discrimination against him, in the form of a hostile work environment caused by sexual harassment?

\_\_\_\_\_  
YES

  
\_\_\_\_\_  
NO

2. Has the plaintiff proved by a preponderance of the evidence that the defendant retaliated against him as a result of his complaints regarding sexual harassment?

\_\_\_\_\_  
YES

  
\_\_\_\_\_  
NO

NOTE: If you answered "NO" to Questions 1 and 2, stop. The foreperson should sign the verdict slip; your deliberations are over. If you answered "YES" to either Question 1 or 2, or both, please proceed to the next question.

3. Has the plaintiff proved by a preponderance of the evidence that he suffered a constructive discharge?

\_\_\_\_\_  
YES

\_\_\_\_\_  
NO

NOTE: If you answered "YES" to Questions 1 and/or 2, as well as 3, proceed to the next two questions.

4. What is the amount of money, if any, that will reasonably and fairly compensate the plaintiff for lost back wages from April 22, 2003 until today?

\_\_\_\_\_  
in words

\_\_\_\_\_  
in figures

5. What is the amount of money, if any, that will reasonably and fairly compensate the plaintiff for lost front wages?

\_\_\_\_\_  
in words

\_\_\_\_\_  
in figures

NOTE: If you answered "YES" to Questions 1 and/or 2, please proceed to the next question.

6. What is the amount of money, if any, that will reasonably and fairly compensate the plaintiff for his emotional distress?

\_\_\_\_\_  
in words

\_\_\_\_\_  
in figures

7. If you awarded any amount of damages to the plaintiff in response to Questions Four, Five, or Six do you wish to award prejudgment interest as well?

            
YES

            
NO

NOTE: If you award prejudgment interest, the court will calculate the amount of interest.

3/2/07  
Date

  
Foreperson